

1 DAVID R. SINGH (Bar No. 300840)  
2 david.singh@weil.com  
3 WEIL, GOTSHAL & MANGES LLP  
4 201 Redwood Shores Parkway, 4th Floor  
5 Redwood Shores, CA 94065  
6 Telephone: (650) 802-3000  
7 Facsimile: (650) 802-3100

8 Attorneys for Defendants GOODRX, INC.  
9 and GOODRX HOLDINGS, INC.

10 DANIEL L. WARSHAW (Bar No. 184365)  
11 dvarshaw@pwfirm.com  
12 PEARSON WARSHAW, LLP  
13 15165 Ventura Boulevard, Suite 400  
14 Sherman Oaks, CA 91403  
15 Telephone: (818) 788-8300  
16 Facsimile: (818) 788-8104

17 Attorneys for Plaintiffs and the Proposed Class  
18 (Additional Counsel Listed on Signature Page)

19 UNITED STATES DISTRICT COURT  
20 CENTRAL DISTRICT OF CALIFORNIA  
21 WESTERN DIVISION

22 C&H PHARMACY INC., D/B/A,  
23 HUNNINGTON PHARMACY PROPST  
24 DISCOUNT DRUGS INC, INC., REEVES  
25 DRUG STORE, AND STAR DISCOUNT  
26 PHARMACY, INC., individually and on  
27 behalf of itself and all others similarly  
28 situated,

Plaintiffs,

v.

GOODRX, INC.; GOODRX HOLDINGS,  
INC.; CVS CAREMARK  
CORPORATION;  
EXPRESS SCRIPTS HOLDING  
COMPANY; MEDIMPACT  
HEALTHCARE SYSTEMS, INC.; and  
NAVITUS HEALTH SOLUTIONS LLC,  
Defendants.

Case No. 2:25-cv-00082-SPG-SK

**JOINT STIPULATION  
EXTENDING TIME TO RESPOND  
TO PLAINTIFF'S COMPLAINT**

Earliest Complaint Served: 01/15/2025

Earliest Response Due: 02/06/2025

Courtroom 5C

Honorable Sherilyn Peace Garnett

1 IT IS HEREBY STIPULATED and AGREED by and among C&H Pharmacy, dba,  
2 Huntington Pharmacy, Propst Discount Drugs, Inc., Reeves Drug Store, and Star Discount  
3 Pharmacy, Inc., (“**Plaintiffs**”) and GoodRx, Inc., GoodRx Holdings, Inc., CVS Caremark  
4 Corporation, Express Scripts Holding Company, MedImpact Healthcare Systems, Inc.,  
5 and Navitus Health Solutions LLC (together, “**Defendants**” and, with Plaintiff, the  
6 “**Parties**”), by and through their attorneys undersigned, pursuant to Federal Rule of Civil  
7 Procedure 6(b), that:

8 **RECITALS**

9 WHEREAS, Plaintiffs filed the *Class Action Complaint* [ECF No. 1] (the  
10 “**Complaint**”) in the above-captioned action (the “**Action**”) on January 3, 2025;

11 WHEREAS, twelve other complaints involving substantially similar defendants,  
12 making substantially similar allegations, and asserting substantially similar causes of  
13 action were filed in four federal district courts—specifically, *Keaveny Drug, Inc. v.*  
14 *GoodRx, Inc., et al.*, No. 2:24-cv-09379 (C.D. Cal. Oct. 30, 2024); *Community Care*  
15 *Pharmacy, LLC v. GoodRx, Inc., et al.*, No. 2:24-cv-09490 (C.D. Cal. Nov. 1, 2024); *Grey*  
16 *Dog IV v. GoodRx, Inc., et al.*, No. 2:24-cv-09858 (C.D. Cal. Nov. 14, 2024); *Minnesota*  
17 *Independent Pharmacists v. GoodRx, Inc., et al.*, No. 2:24-cv-10297 (C.D. Cal. Nov. 27,  
18 2024); *CAAS, LLC v. GoodRx, Inc., et al.*, No. 2:24-cv-10899 (C.D. Cal. Dec. 18, 2024);  
19 *Bueno Pharmacy LLC v. GoodRx, Inc., et al.*, No. 1:24-cv-00537 (D.R.I. Dec. 20, 2024);  
20 *Philadelphia Association of Retail Druggists v. GoodRx, Inc., et al.*, No. 2:24-cv-11023  
21 (C.D. Cal. Dec. 23, 2024); *SDDDC LLC, v. GoodRx, Inc., et al.*, No. 1:24-cv-00550 (D.R.I.  
22 Dec. 26, 2024); *Lakhani Rx Inc. v. GoodRx, Inc.*, No. 1:25-cv-00003 (D.R.I. Jan. 3, 2025);  
23 *Pressman, Inc. v. GoodRx, Inc., et al.*, No. 1:25-cv-00115 (E.D.N.Y. Jan. 7, 2025); and  
24 *Western Pillbox, Inc. v. GoodRx, Inc., et al.*, No. 3:25-cv-00063 (D. Conn. Jan. 13, 2025)  
25 (collectively with the Action, the “**Related Actions**”);

26 WHEREAS, on November 26, 2024, plaintiffs Old Baltimore Pike Apothecary,  
27 Inc. t/a Southern Chester County Pharmacy and Smith’s Pharmacy II, Inc. d/b/a Smith’s  
28 Pharmacy filed a *Motion to Transfer and Centralize Related Actions for Consolidated or*

1 *Coordinated Pretrial Proceedings* (the “**Motion to Transfer**”) with the United States  
2 Judicial Panel on Multidistrict Litigation (“**JPML**”), requesting that the JPML transfer  
3 certain of the Related Actions to the United States District Court for the District of Rhode  
4 Island for consolidated or coordinated pretrial proceedings;

5 WHEREAS, on December 20, 2024, plaintiffs Old Baltimore Pike Apothecary, Inc.  
6 t/a Southern Chester County Pharmacy and Smith’s Pharmacy II, Inc. d/b/a Smith’s  
7 Pharmacy dismissed their action in the District of Rhode Island, withdrew the Motion to  
8 Transfer, and refiled their action in the Central District of California (No. 2:24-cv-11023)  
9 (Dec. 23, 2024);

10 WHEREAS, on or about December 30, 2024, plaintiffs Keaveny Drug, Inc.,  
11 Community Care Pharmacy, LLC, Minnesota Independent Pharmacists, and Smith’s  
12 Pharmacy II, Inc. moved to intervene in certain of the Related Actions pending in the  
13 District of Rhode Island, including *Bueno Pharmacy, LLC v. GoodRx, Inc., et al.*, No.  
14 1:24-cv-00537, for the purpose of requesting transfer of the actions to the Central District  
15 of California pursuant to 28 U.S.C. § 1404(a) and the first-to-file rule;

16 WHEREAS, on January 13, 2025, plaintiff Grey Dog IV d/b/a Ethos  
17 Wellness/Pharmacy filed a *Motion to Transfer and Centralize Related Actions for*  
18 *Consolidated or Coordinated Pretrial Proceedings* (the “**Second Motion to Transfer**”)  
19 with the JPML, requesting that the JPML transfer the Related Actions to the United States  
20 District Court for the District of Rhode Island for consolidated or coordinated pretrial  
21 proceedings;

22 WHEREAS, the Parties agree that Defendants’ time to answer, move, or otherwise  
23 respond in the Action should—in order to conserve the Court’s and the Parties’ resources  
24 and promote the just, efficient, and fair resolution of the Action—be extended until after  
25 venue in the Related Actions has been resolved.

26 NOW, THEREFORE, based upon the foregoing recitals, which are incorporated as  
27 though fully set forth herein, IT IS HEREBY STIPULATED and AGREED and, upon  
28 Court approval, it shall be ordered, as follows:

1           1. Defendants' time to answer, move, or otherwise respond in the Action is  
2 extended until forty-five (45) days after the later of: (i) the date upon which plaintiffs in  
3 the Related Actions have filed a consolidated complaint in any district or (ii) the date  
4 upon which the JPML rules upon the Second Motion to Transfer (the "**Extension**  
5 **Period**").

6           2. During the Extension Period, none of the Parties shall seek or be required to  
7 provide the disclosures or discovery contemplated by Federal Rules of Civil Procedure  
8 26, 30, 31, 33, 34, or 36.

9           3. If Defendants answer, move, or otherwise plead with respect to a complaint  
10 in a Related Action pending in any district, Defendants will concurrently answer, move,  
11 or otherwise plead with respect to the Complaint in the Action.

12           4. This stipulation and proposed order does not constitute a waiver of any of  
13 the Parties' claims, rights, arguments, or defenses, including but not limited to the right  
14 to seek a further extension of Defendants' time to answer or otherwise respond to the  
15 Complaint or any other pleading filed by Plaintiffs in any of the Related Actions.

16  
17 Dated: January 15, 2025

Respectfully submitted,

PEARSON WARSHAW

By: /s/ Daniel L. Warshaw  
DANIEL L. WARSHAW

21 Daniel L. Warshaw (Bar No. 185365)  
22 Bobby Pouya (Bar No. 245527)  
23 Naveed Abaie (Bar No. 323338)  
24 PEARSON WARSHAW, LLP  
15165 Ventura Boulevard, Suite 400  
Sherman Oaks, CA 91403  
25 Telephone: (818) 788-8300  
26 Facsimile: (818)-788-810  
27 dwarshaw@pwfirm.com  
28 bpouya@pwfirm.com  
nabaie@pwfirm.com

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Eric J. Artrip (*pro hac vice* forthcoming)  
MASTANDO & ARTRIP, LLC  
301 Holmes Ave NE, Suite 100  
Huntsville, Alabama 35801  
Telephone: (256) 532-2222  
artrip@mastandoartrip.com

Attorneys for Plaintiffs and the Proposed  
Class

Dated: January 15, 2025

Respectfully submitted,  
WEIL, GOTSHAL & MANGES LLP

By: /s/ David R. Singh  
DAVID R. SINGH

David R. Singh (Bar No. 300840)  
WEIL, GOTSHAL & MANGES LLP  
201 Redwood Shores Parkway, 4th Floor  
Redwood Shores, CA 94065  
Telephone: (650) 802-3000  
Facsimile: (650) 802-3100  
david.singh@weil.com

David J. Lender (*pro hac vice* forthcoming)  
Eric S. Hochstadt (*pro hac vice*  
forthcoming)  
Jennifer Brooks Crozier (*pro hac vice*  
forthcoming)  
Alexandra Rose (*pro hac vice* forthcoming)  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
david.lender@weil.com  
eric.hochstadt@weil.com  
jennifer.crozier@weil.com  
alexandra.rose@weil.com

Attorneys for Defendants GOODRX, INC.  
and GOODRX HOLDINGS, INC.

1  
2 By: /s/ Randy Luskey

3 RANDY LUSKEY

4 Randy Luskey (Bar No. 240915)  
5 PAUL, WEISS, RIFKIND, WHARTON &  
6 GARRISON LLP  
7 535 Mission Street, 24th Floor  
8 San Francisco, California 94105  
9 Telephone: (628) 432-5100  
10 Facsimile: (628) 232-3101  
11 rluskey@paulweiss.com

12 Robert A. Atkins (*pro hac vice*  
13 forthcoming)

14 Jacqueline P. Rubin (*pro hac vice*  
15 forthcoming)

16 PAUL, WEISS, RIFKIND, WHARTON &  
17 GARRISON LLP

18 1285 Avenue of the Americas  
19 New York, New York 10019-6064  
20 Telephone: (212) 373-3000  
21 Facsimile: (212) 757-3990  
22 ratkins@paulweiss.com  
23 jrubin@paulweiss.com

24 Attorneys for Defendant CVS  
25 CAREMARK CORP.

26 By: /s/ Mike Bonanno

27 MIKE BONANNO

28 Anthony P. Alden (Bar No. 232220)  
QUINN EMANUEL URQUHART &  
SULLIVAN LLP  
865 South Figueroa Street, 10th Floor  
Los Angeles, California 90017-2543  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100  
anthonyalden@quinnemanuel.com

Mike Bonanno (*pro hac vice* forthcoming)

1 Meghan McCaffrey (*pro hac vice*  
2 forthcoming)  
3 QUINN EMANUEL URQUHART &  
4 SULLIVAN LLP  
5 1300 I Street NW, Suite 900  
6 Washington, D.C. 20005  
7 Telephone: (202) 538-8000  
8 Facsimile: (202) 538-8100  
9 mikebonanno@quinnemanuel.com  
10 meganmccaffrey@quinnemanuel.com

11 Attorneys for Defendant EXPRESS  
12 SCRIPTS, INC.

13 By: /s/ Michelle S. Lowery  
14 MICHELLE S. LOWERY

15 Michelle S. Lowery (Bar No. 302882)  
16 MCDERMOTT WILL & EMERY LLP  
17 2049 Century Park East, Suite 3200  
18 Los Angeles, California 90067-3206  
19 Telephone: (310) 277-4110  
20 Facsimile: (310) 277-4730  
21 mslowery@mwe.com

22 Richard Salgado (*pro hac vice*  
23 forthcoming)  
24 MCDERMOTT WILL & EMERY LLP  
25 2501 North Harwood Street, Suite 1900  
26 Dallas, Texas 75201  
27 Telephone: (214) 295-1664  
28 Facsimile: (972) 232-3098  
richard.salgado@mwe.com

Attorneys for Defendant MEDIMPACT  
HEALTHCARE SYSTEMS, INC.

By: /s/ Robert J. Herrington  
ROBERT J. HERRINGTON

Robert J. Herrington (Bar No. 234417)



1 GREENBERG TRAURIG LLP  
2 robert.herrington@gtlaw.com  
3 1840 Century Park East, Suite 1900  
4 Los Angeles, CA 90067  
5 Telephone: (310) 586-7700

6 Gregory J. Casas (*pro hac vice*  
7 forthcoming)  
8 casasg@gtlaw.com  
9 300 West 6th Street, Suite 2050  
10 Austin, TX 78701-4052  
11 Telephone: (512) 320-7200

12 James Peacock (*pro hac vice*  
13 forthcoming)  
14 James.Peacock@gtlaw.com  
15 2200 Ross Avenue Suite 5200  
16 Dallas TX 75201  
17 Telephone: (214) 665-3600

18 Becky L. Caruso (*pro hac vice*  
19 forthcoming)  
20 becky.caruso@gtlaw.com  
21 500 Campus Drive, Suite 400  
22 Florham Park, NJ 07932  
23 Telephone: (973) 443-3252

24 Attorneys for Defendant NAVITUS  
25 HEALTH SOLUTIONS, LLC

26 *Filer's Attestation: Pursuant to Local Rule 5-4.3.4(a)(2)(i), David R. Singh hereby attests*  
27 *that concurrence in the filing of this document and its contents was obtained from all*  
28 *signatories listed above.*